

Breakout Group 3

Pollution Reductions and Off-setting New Loads

The following questions are intended to help prompt your thinking. They focus on nutrients; however, your feedback need not be limited in that manner. Feel free to provide any feedback that you think would be constructive.

Two primary objectives of TMDL implementation are:

- Reducing Excessive Pollutants
- Off-setting New Loads

1. Traditionally, “implementation plans” have focused primarily on analyses to reduce existing pollutant loads. How can the process of off-setting new loads be incorporated into traditional implementation planning assessments?
2. The Guidance suggests linking off-sets to reductions by urging developers to invest in reductions as a condition of developing or subdividing plats in an impaired subwatershed. This could be accomplished by having off-set computations include a “premium factor” or ratio that is greater than one pound removed for one new pound created. This approach would also represent a means of leveraging resources for helping achieve reductions. Is there any potential merit in this general concept? Can you suggest specific operational approaches or examples in which this has been or could be applied? Could this general concept be applied in situations involving degraded non-tidal streams?
3. The Guidance suggests that, by addressing TMDLs early in the land use planning process, costs and delays associated with addressing TMDLs during the later stages, e.g., during subdivision and site design, can be avoided. In particular, the Guidance suggests that costs and delays associated with administering site-specific off-sets might be avoided by addressing them within the context of earlier stages of land use planning. Does this seem conceptually reasonable? How might this relate to Question 1 posed above? Can you suggest any specific examples in which this concept could be applied? Could this concept also apply to managing the integrity of non-tidal streams (think “impervious surface”)?